

**SMITH LARSEN & WIXOM**

ATTORNEYS  
HILLS CENTER BUSINESS PARK  
1935 VILLAGE CENTER CIRCLE  
LAS VEGAS, NEVADA 89134  
(702) 252-5002 • (702) 252-5006

Michael D. Stanger  
Nevada Bar No. 8272  
STRONG & HANNI, P.C.  
102 South 200 East, Suite 800  
Salt Lake City, Utah 84111  
Telephone: (801) 532-7080  
Facsimile: (801) 596-1508  
Email: [mstanger@strongandhanni.com](mailto:mstanger@strongandhanni.com)

Kent F. Larsen, Esq.  
Nevada Bar No. 3463  
SMITH LARSEN & WIXOM  
1935 Village Center Circle  
Las Vegas, Nevada 89134  
Tel: (702) 252-5002  
Fax: (702) 252-5006  
Email: [kfl@slwlaw.com](mailto:kfl@slwlaw.com)  
*Attorneys for Third Party Defendant  
Southwestern Construction, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA FOR  
THE USE AND BENEFIT OF WELLS  
CARGO, INC.,

Plaintiff,

v.

ALPHA ENERGY AND ELECTRIC, INC.,  
a Missouri Corporation, and American  
Contractors Indemnity Company, a  
California corporation,

Defendants.

ALPHA ENERGY AND ELECTRIC, INC.,  
a Missouri Corporation,

Third-Party Plaintiff,

v.

NORTHCON, INC., an Idaho Corporation;  
SOUTHWESTERN CONSTRUCTION,  
INC., a Utah Corporation; DOES 1 through  
10; and ROE Corporations 1 through 10,

Third-Party Defendants.

CASE NO: 2:18-cv-01182-JCM-CWH

**STIPULATION TO EXTEND TIME  
FOR REPLY MEMORANDUM IN  
SUPPORT OF SOUTHWESTERN'S  
MOTION FOR SUMMARY  
JUDGMENT**

**(First Request)**

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Plaintiffs and Defendants, by and through their respective council of record and pursuant to LR IA 6-1, hereby stipulate that Southwestern Construction, Inc. (“Southwestern”) shall have an extension to and including June 7, 2022, given the current due date of May 31, 2022, to file its Reply Memorandum in Support of Southwestern’s Motion for Summary Judgment. In support of this stipulation, the parties state as follows:

1. Southwestern’s Reply Memorandum is currently due on May 31, 2022.
2. Southwestern seeks an extension of time to and including June 7, 2022, to serve its Reply Memorandum.
3. This is the first stipulation for extension of time to file any reply memoranda.
4. This extension is requested to accommodate the litigation schedule of Mr. Stanger, Southwestern’s lead counsel, as well as some Covid issues with Mr. Stanger’s staff and co-workers, and time spent assisting Mr. Stanger’s wife who had surgery.
5. The parties agree that Southwestern’s Reply Memorandum shall be due on or before June 7, 2022.
6. The parties move the Court to enter an Order consistent with this stipulation.

DATED this 31<sup>st</sup> day of May, 2022.

/s/ Michael D. Stanger

Michael D. Stanger

Kent F. Larsen, Esq.

*Attorneys for Third-Party Defendant*

*Southwestern Construction, Inc.*

DATED this 31<sup>st</sup> day of May, 2022.

/s/ Stephen J. Moore

(Signed by Michael D. Stanger with permission of Stephen J. Moore)

Stephen J. Moore

Paul K. Hentzen, Esq.

Jakub P. Medralla, Esq.

*Attorneys for Defendant/Third-Party Plaintiff Alpha Energy and Electric, Inc.*

DATED this 31<sup>st</sup> day of May, 2022.

/s/ Benjamin J. McDonnell

(Signed by Michael D. Stanger with

**SMITH LARSEN & WIXOM**

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permission of Benjamin J. McDonnell)  
Benjamin J. McDonnell  
Ryan D. Yahne  
Donna DiMaggio  
Brian W Boschee  
*Attorneys for Third-Party Defendant  
Northcon, Inc.*

DATED this 31<sup>st</sup> day of May, 2022.

/s/ Jordan F. Faux  
(Signed by Michael D. Stanger with  
permission of Kurt C. Faux)  
Kurt C. Faux, Esq.  
Willi H. Siepmann, Esq.  
Jordan F. Faux, Esq.  
*Attorneys for American Contractors  
Indemnity Company*

IT IS SO ORDERED:

  
UNITED STATES DISTRICT JUDGE

DATED: May 31, 2022

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 31<sup>st</sup> day of May, 2022, a true and correct copy of the foregoing **STIPULATION TO EXTEND TIME FOR REPLY MEMORANDUM IN SUPPORT OF SOUTHWESTERN'S MOTION FOR SUMMARY JUDGMENT** was electronically via ECF notification upon all counsel of record.

/s/ Michael D. Stanger